



ALASKA FEDERATION  
OF NATIVES

May 28, 2021

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

**RE: Expanding Flexible Use of the 12.2-12.7 GHz Band  
WT Docket No. 20--443**

Dear Ms. Dortch:

**Summary:** We are writing in opposition to any changes to the current use by next-generation satellite systems of the 12.2-12.7 GHz band to connect Americans across the country. Next-generation satellite providers—as well as other satellite services—are actively and efficiently utilizing this band to bring broadband service to tens of thousands of homes and satellite television to millions. With commitments under the Rural Digital Opportunity Fund to serve hundreds of thousands more and new launches on a weekly basis, this intensive use of the band will only grow in the coming years. These next-generation systems are demonstrating a commitment to rapid deployment, proving out the Commission’s wisdom in authorizing LEO systems to utilize the 12 GHz band.

**Background:**

The Alaska Federation of Natives is the largest, statewide membership organization for the indigenous peoples of Alaska. “Alaska Natives” is a term representing many Indigenous cultures in Alaska: Tlingit Indian, Haida Indian, Tsimshian Indian, Inupiat Eskimo, Yupik Eskimo, Siberian Eskimo and Aleut. With over 140,000 Alaska Natives, we are 20% of the entire population of Alaska. Prior to World War II, we were the majority population in the state. Our people are scattered in every corner – small cities, regional hubs and over 200 remote villages in a land mass 1/5 the size of the United States. Many of our homes, businesses, and communities have traditionally had no access to reliable broadband. Alaska Natives have used and occupied Alaska for over 10,000 years living a hunting, fishing, and gathering lifestyle. With over 227 federally recognized tribes (half the tribes in the U.S.) and hundreds of remote isolated Native villages, and summer camps, our people still hunt and fish to feed their families – from whales, walrus, seals, moose, deer, ducks, geese and of course fish. Because of our Congressional land claims, we remain the largest private landowner in Alaska, owning over 45 million acres of land.

With increased connectivity in our rural villages, we would have a greater opportunity to build a better future for our children.

We would be able to expand telemedicine and access to health care; expand educational opportunities; design new ways government services can be delivered and explore economic opportunities. With

connectivity, we can overcome the problem of remote, isolated geography of our villages. With the current pandemic, the gaps in health care and education and the inequity have been exposed.

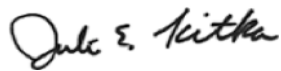
Fortunately, next-generation satellites systems using the 12 GHz band are improving our access to broadband. As the Commission has recognized, next-generation satellite broadband can finally offer the low-latency, high-speed broadband that is necessary today.

In stark contrast to the demonstrable deployment and increasingly widespread service provided by next-generation satellite systems, the low-power, fixed terrestrial licensees asking the Commission to change the rules on 12 GHz are nothing more than an encumbrance to true broadband. Despite years of assurances, these terrestrial licensees have effectively deployed no meaningful service. Given this history of empty promises, we encourage the Commission to disregard speculative pleas to redefine the rules. The Commission correctly established a very high bar in its Notice of Proposed Rulemaking, placing the burden on the terrestrial licensees to prove that they would not interfere with next-generation satellite broadband and asked for a real proposal on how they would use the band to provide broadband to unserved and underserved communities. They have not done so.

The 12 GHz band is already heavily shared and extensively utilized. Next-generation satellite systems like Starlink are focused on communities like ours that have few options. Taking the spectrum away from satellite broadband to re-allocate to companies who have repeatedly failed to deploy would not serve our interests or help close the digital divide.

We encourage the Commission to reject the speculative attempts to upend the well-established and well-balanced spectrum sharing rules that are today the hallmark of the 12 GHz band.

Respectfully,

A handwritten signature in black ink, reading "Julie E. Kitka". The signature is written in a cursive, flowing style.

Julie Kitka, President